

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS

DICK VAN DUJIN, §
§
Plaintiff, § Docket No. 5:19-cv-5223-PKH
§
v. § JURY TRIAL DEMANDED
§
HOG RADIO INC., §
§
Defendant. §

ANSWER TO COMPLAINT

Comes Defendant, Hog Radio Inc. and for its Answer to Complaint states:

1. Defendant Hog Radio Inc. (herein referred to as "Defendant") denies each and every material allegation set forth in the Complaint unless specifically admitted herein.
2. Defendant denies that Plaintiff Dick Van Dujin (herein referred to as "Plaintiff") is entitled to the relief set forth in Paragraph No. 1 of the Complaint.
3. Defendant admits the allegations contained in Paragraph No. 2 of the Complaint.
4. Defendant admits the allegations contained in Paragraph No. 3 of the Complaint.
5. Defendant admits the allegations contained in Paragraph No. 4 of the Complaint.
6. With respect to Paragraph No. 5 of the Complaint, Defendant does not have information sufficient to admit or deny the allegations set forth in Paragraph No. 5 of the Complaint and therefore must deny same.
7. Defendant admits the allegations contained in Paragraph No. 6 of the Complaint.
8. With respect to all the other allegations set forth in the Complaint, Defendant respectfully states that the Plaintiff has disavowed the legitimacy of this lawsuit and has stated that the lawyer, Richard Liebowitz, that filed this lawsuit is not authorized to represent him. See Exhibit

“A”, a copy of which is attached hereto and incorporated herein. The undersigned counsel forwarded an email to Mr. Liebowitz informing him that Defendant had received confirmation that he was not authorized to represent the Plaintiff and that he was not licensed in the State of Arkansas to practice law. A copy of this correspondence is attached hereto as Exhibit “B” and incorporated herein. Mr. Liebowitz filed a Motion to Appear Pro Hac Vice on December 11, 2019.

9. Based on the foregoing, the Complaint herein should be dismissed.

WHEREFORE, Defendant Hog Radio Inc. respectfully prays for the relief set forth above, for its costs, attorney fees and all other proper relief.

Respectfully Submitted,

SHEMIN LAW FIRM, PLLC
5100 W J.B. Hunt Drive
Suite 1010
Rogers, AR 72758
Telephone: (479) 845-3305
Facsimile: (479) 845-2198

By:



Kenneth R. Shemin
Arkansas Bar No. 78138

CERTIFICATE OF SERVICE

I, Kenneth R. Shemin, do hereby certify that I have sent via:

- U.S. Mail, postage prepaid
 Hand-delivery
 Facsimile
 Electronic Mail
 Federal Court ECF System to the Clerk of the Court for filing and transmittal of Notice of Electronic Filing to ECF registrants

this 19th day of February, 2020 a true and complete copy of the foregoing attached document to the following individual(s):

Mr. Richard Liebowitz

-via electronic mail to: *rl@liebowitzlawfirm.com*



Kenneth R. Shemin